

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

DARREL K. THOMPSON, *et al.*,

Plaintiffs

v.

STRYKER CORPORATION, *et al.*,

Defendants.

No. 1:20-CV-1111

Hon. Robert J. JONKER

Motion to Withdraw as Attorney of Record

Comes now the undersigned attorney of record for the Plaintiffs and moves to withdraw as counsel of record, and for this Court to grant leave for the undersigned attorney to withdraw, for the following reasons:

1. On November 3, 2020, the United States District Court for the Western District of Tennessee transferred the present case to the United States District Court for the Western District of Michigan. (ECF 2:19-cv-2038 Doc. 65 (W.D. Tenn.), and ECF 2:16-cv-3013 Doc. 70 (W.D. Tenn.)).
2. This attorney is not admitted to practice in the United States District Court for the Western District of Michigan.
3. Pursuant to Local General Rule 2.5, this attorney has not appeared in the Western District of Michigan on behalf of the Plaintiffs, has not filed an entry of appearance, and has not signed a pleading, motion, or other paper as attorney for any of the named Plaintiffs.
4. The client insists upon presenting a claim or defense that this attorney believes is not warranted under existing law and cannot be supported by good faith argument.

5. The client's conduct renders it unreasonably difficult for the lawyer to carry out his representation effectively.

6. It would be unduly burdensome on this attorney to represent the Plaintiffs in the present case considering having to appear in person in the Western District of Michigan and because he is not admitted in the United States District Court for the Western District of Michigan.

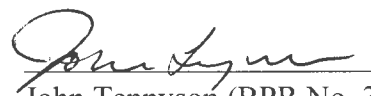
7. This attorney is of the opinion that the above-stated reasons are compelling and that to allow this attorney to withdraw will not prejudice the client or the trial of this case. This attorney further asks the Court to allow the Plaintiffs sufficient time to find alternate Counsel.

8. This attorney certifies that, pursuant to W.D. Tenn. Local Rule 83.01(g), that he has given written notice to the Plaintiffs of his intention withdraw at least fourteen (14) days prior to filing the motion to withdraw. (Exhibit A).

9. This attorney certifies that he has served a draft motion to withdraw on the Plaintiffs. (Exhibit B).

WHEREFORE, the undersigned attorney prays the Court to allow him to withdraw as counsel of record, for this Court to grant its leave for the undersigned attorney to withdraw, and for this Court to allow the Plaintiffs sufficient time to retain new counsel.

Respectfully submitted,


John Tennyson (BPR No. 32777)
Dunham & Jones
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Nashville, TN 37219
(615) 999-9999
john.tennyson@dunhamlaw.com

Certificate of Service

On this the 30 day of December, 2020, I hereby certify that a copy of the foregoing has been served on all Parties of record via this Court's CM/ECF filing system.

/s/ John Tennyson

John Tennyson

DUNHAM & JONES

ATTORNEYS AT LAW, P.C.

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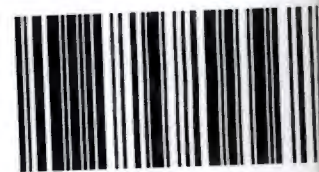
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WAIVER OF SIGNATURE

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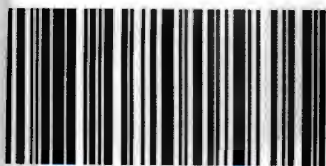
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